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July 31, 2023

Via ECF

The Honorable Douglas E. Arpert, U.S.M.J.
United States District Court
for the District of New Jersey
Clarkson S. Fisher Building
& U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: *Daniel Francisco, et al. v. Peter S. Cooke, Jr., et al.*,
Civil Action No. 21-14575-GC-DEA

Dear Judge Arpert:

As Your Honor will recall, I represent the plaintiffs in the above-captioned action and write to provide a joint status update in this matter. Since the most recent telephonic status conference in this matter on July 5, 2023, the parties have further conferred regarding the path forward in these proceedings and potential streamlining of issues before the Court. Plaintiffs have also conferred internally since that time and intend to make a final decision about how they intend to proceed within approximately the next ten days. Unless the Court prefers otherwise, Plaintiffs propose to provide a further update to the Court on or before August 11, 2023. To the extent the Plaintiffs opt to proceed in a manner which will necessitate briefing, the parties will confer in order to propose a briefing schedule to be included in the August 11 update. I am advised that the Defendants take no position on this approach.

Thank you for your consideration. Counsel are available at the convenience of the Court should Your Honor have any questions.

Respectfully submitted,

/s/ Bradley P. Lehman

cc: All Counsel (via ECF)